

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

JOHN TURNER, et al.

v.

B.V. SHIPPING COMPANY  
LUZON STRAIT (GRONINGEN)

CIVIL ACTION NO. 04-936-JJF

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

For the reasons set forth in the accompanying Brief, Defendant B.V. Shipping Company Luzon Strait (Groningen), hereby moves for summary judgment pursuant to Fed. R. Civ. P. 56 and respectfully requests that Plaintiffs' Second Amended Complaint (D.I. 29) be dismissed with prejudice.

Respectfully submitted,

PALMER BIEZUP & HENDERSON LLP

Date: July 29, 2005

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